



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP
F. #2016R00532

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 10, 2024

By ECF and E-mail

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Sinmyah Amera Ceasar
Criminal Docket Nos. 17-48 (KAM), 19-117 (KAM), and 22-459 (KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter regarding the Probation Department's request to withdraw the pending VOSR charges.

The government is still researching the underlying legal question raised for the first time by Probation yesterday, and we are not ready at this time to articulate a position to the Court as to the continuing validity of the supervised release violations. Nevertheless, the government is prepared to proceed with sentencing as currently scheduled on December 12 and will address the supervised release violations at that time.

Regardless of the government's ultimate position as to the supervised release violations themselves, there is no doubt that the defendant's conduct can and should be considered in connection with sentencing on the defendant's three criminal charges. The underlying judgment was still valid and the defendant was bound by the conditions of supervised release at the times she violated those conditions. The conduct underlying those supervised release violations is itself similar to the offense conduct underlying the defendant's Material Support and Obstruction

Offenses, and the defendant's violations of binding rules exemplifies her long-running pattern of disobedience to lawful authority, both of which are highly relevant to sentencing.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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cc: Clerk of Court (KAM) (by ECF)
Deirdre D. von Dornum, Esq. and Samuel Jacobson, Esq. (by Email and ECF)